

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In the Matter of:

Aimee Bossi,

Debtor(s)

Case No. 21-11535 BLS

Chapter 13

Motion\Doc. No: 40

**LATE RESPONSE TO MOTION FOR
RELIEF FROM AUTOMATIC STAY**

1. No Response is required.
2. Admitted.
3. Admitted that Exhibit A is attached.
4. Admitted that Exhibit B is attached.
5. Admitted that Exhibit C is attached.
6. Admitted that Exhibit D is attached.
7. No Response is required.
8. Debtor requests that a payment history be provided to confirm arrears. Debtor, by and through her counsel, will be filing a Modified Chapter 13 Plan to incorporate any existing arrears.
9. Admitted that Exhibit E is attached.

10. – 24. Debtor believes the value of her property has increased given the current value market. Debtor's property is maintained and insured. This is Debtor's home and necessary for an effective reorganization. Debtor opposes this Motion and will be modifying the Chapter 13 Plan to cure.

WHEREFORE, the Motion should be denied.

GELLERT SEITZ BUSENKELL & BROWN, LLC

Dated: 9/18/2024

By: /s/ERIN K. BRIGNOLA
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